

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

| | | |
|------------------------------|---|----------------------------|
| IN RE: | : | CHAPTER 13 |
| JEFFREY SCOTT LEVAN, | : | |
| AKA JEFF LEVAN, | : | |
| Debtor | : | |
| | : | |
| JACK N. ZAHAROPOULOS, | : | |
| STANDING CHAPTER 13 TRUSTEE, | : | |
| Movant | : | |
| | : | |
| vs. | : | |
| | : | |
| JEFFREY SCOTT LEVAN, | : | |
| AKA JEFF LEVAN, | : | |
| Respondent | : | CASE NO. 1-25-bk-01233-HWV |

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 14th day of August 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Agatha R. McHale, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Debtor's Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtor has access to non-exempt equity in the following:
 - a. Residential real estate. Trustee requests proof of the value of Debtor's home as stated in his schedules.
2. Trustee avers that Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid – 100% Plan.
3. Trustee avers that Debtor's Plan cannot be administered due to the lack of the following:
 - a. Debtor has not provided Trustee with the Proof of Claim for Brenner Car Care.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Agatha R. McHale, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 14th day of August 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee